



CIRCUIT COURT FOR ANNE ARUNDEL COUNTY

8 Church Circle, Annapolis, Maryland 21401
 Phone: (410) 222-1397 Maryland Relay call: 711
 Toll-free (In-state only): (888) 246-0615

TO: John White

Name
706 Giddings AvenueAddress 1
Suite 200Address 2
Annapolis, Maryland 21401

City, County, State, Zip

Case No. C-02-CV-23-000601

Issue Date: 07/11/2025

Service Deadline: 60 days after the Issue Date.

STATE OF MARYLAND

OR

Compass Marketing, Inc.

vs.

Daniel White et al.

Plaintiff

Defendant

SUBPOENA

You are hereby compelled:

☒ To appear and:☐ testify at a court proceeding in the above case, and☐ produce the following documents, electronically stored information, or tangible things:☒ testify at a deposition associated with the above case, and☐ produce and permit inspection, copying, testing, or sampling the following documents, electronically stored information, or tangible things:

See attached Notice of Intention To Take Videotaped Deposition

at the following location: 100 Light Street, 19th Floor

Baltimore, Maryland 21202

Address of Court or Other Location

City, State, Zip

on July 24, 2025

at 9:30

Time

☒ AM ☐ PMAppearance to be: ☒ in person ☐ remote (details of remote proceeding will be supplied prior to court proceeding)

Flywheel Digital LLC; Ascential Ltd; Informa plc

requested issuance of this subpoena. Questions should be referred to:

Tonya Kelly Cronin

100 Light Street, 19th Floor

(410) 862-1049 Name
tykelly@bakerdonelson.com

Baltimore, Maryland 21202

Phone E-mail

City, State, Zip

Special Message:

- ☐ If this subpoena compels the production of financial information, or information derived from financial records, the requestor of this subpoena hereby certifies having taken all necessary steps to comply with the requirements of Md. Code Ann., Financial Institutions § 1-304 and any other applicable law.
- ☐ If this subpoena compels the production of medical records, the requestor of this subpoena hereby certifies having taken all necessary steps to comply with the requirements of Md. Code Ann., Health-General § 4-306 and any other applicable law.
- ☐ Foreign Subpoena and/or Undertaking forms are attached and are incorporated by reference and are made part of this subpoena.

Scott Poyer, Clerk

Circuit Court for Anne Arundel County

NOTICE:

1. YOU ARE LIABLE TO BODY ATTACHMENT AND/OR FINE FOR FAILURE TO OBEY THIS SUBPOENA.
2. This subpoena is effective for the date and time stated and any subsequent dates as directed by the court.
3. If this subpoena is for attendance at a deposition and the party served is an organization, notice is hereby given that the organization must designate one or more persons who will testify on its behalf, pursuant to Rule 2-412(d).
4. Serving or attempting to serve a subpoena more than 60 days after the date of issuance is prohibited.

RETURN OF SERVICE

I certify that I delivered the original of this Subpoena to the following person(s):

on the following date: by the following method (specified as required by Rule 2-126):

Printed Name

Signature

IN THE CIRCUIT COURT FOR
ANNE ARUNDEL COUNTY, MARYLAND

COMPASS MARKETING, INC.

*

Plaintiff,

*

v.

Case No. C-02-CV-23-000601

*

DANIEL WHITE, *et al.*

*

Defendants.

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NOTICE OF INTENTION TO TAKE VIDEOTAPED DEPOSITION
OF JOHN WHITE

To:

JOHN WHITE

c/o Joyce E. Smithey
Reuben W. Wolfson
David M.E. Moon
Liesel J. Schopler
SMITHEY LAW GROUP, LLC
706 Giddings Avenue, Suite 200
Annapolis, Maryland 21401

From:

**FLYWHEEL DIGITAL LLC, ASCENTIAL LTD, AND
INFORMA PLC**

Tonya Kelly Cronin (AIS No.: 0212180158)
Michael Brown (AIS No.: 1812110045)
BAKER, DONELSON, BEARMAN, CALDWELL &
BERKOWITZ, P.C.
100 Light Street, 19th Floor
Baltimore, Maryland 21202
(410) 862-1049
tykelly@bakerdonelson.com
mbrown@bakerdonelson.com

Michael C. Keats (Special Admission No. 2412191003)
Rebecca L. Martin (Special Admission No. 2412191005)
Katherine L. St. Romain (*special admission forthcoming*)
FRIED, FRANK, HARRIS, SHRIVER
& JACOBSON LLP
One New York Plaza
New York, New York 10004-1980
(212) 859-8000
michael.keats@friedfrank.com

rebecca.martin@friedfrank.com
katherine.st.romain@friedfrank.com

PLEASE TAKE NOTICE that, pursuant to Rules 2-412, 2-422, and 2-510 of the Maryland Rules of Civil Procedure, Defendants Flywheel Digital LLC, Ascential Ltd, and Informa plc, through undersigned counsel, will take the deposition of John White on July 24, 2025 at 9:30 a.m., for the purpose of discovery, hearing, and/or trial. The deposition will be held in person and hosted by Baker, Donelson, Bearman, Caldwell & Berkowitz, P.C., 100 Light Street, 19th Floor, Baltimore, Maryland 21202. Such deposition will be recorded by stenographic, autographic, and videographic means, and will continue from day to day until complete.

Dated: Baltimore, Maryland
July 11, 2025

Respectfully submitted,

By: /s/ Ty Kelly

Tonya Kelly Cronin (AIS No.: 0212180158)
Michael Brown (AIS No.: 1812110045)
BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.
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*Attorneys for Defendants Flywheel Digital LLC,
Ascential Ltd, and Informa plc*

Michael C. Keats (Special Admission No.
2412191003)
Rebecca L. Martin (Special Admission No.
2412191005)
Katherine L. St. Romain (*special admission
forthcoming*)
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rebecca.martin@friedfrank.com
katherine.st.romain@friedfrank.com

*Attorneys for Defendants Flywheel Digital LLC,
Ascential Ltd, and Informa plc*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 11th day of July, 2025, a copy of Defendants Flywheel Digital LLC, Ascential Ltd, and Informa plc's Notice of Intention to Take Videotaped Deposition of John White was served electronically via email on all counsel of record. On the same day, a copy of the aforementioned document was served electronically via MDEC on all counsel of record.

/s/ Ty Kelly
Tonya Kelly Cronin

Your claim, Your basis for Your assertion that You are/were entitled to repayment of those costs, expenses, and damages, and list in Your Answers to Interrogatories all Documents which refer, relate, or pertain to same.

5. Identify all business opportunities You contend You have lost as a result of one or more of the Various Schemes, specifically identifying each business opportunity, the date(s) of the business opportunity, the specific one or more Various Schemes to which you attribute the lost, and the damages You attribute to same.

6. Identify all investments You contend You have lost as a result of the Various Schemes, specifically identifying each investment, the date of the lost investment, and the damages attributed You attribute to same.

7. If You contend that Michael has made any admissions against interest, describe each such admission, including the nature of the admission, the date it was made, and the medium by which it was made (*i.e.*, oral, email, writing).

8. If You contend that George has made any admissions against interest, describe each such admission, including the nature of the admission, the date it was made, and the medium by which it was made (*i.e.*, oral, email, writing).

9. If You contend that Debra has made any admissions against interest, describe each such admission, including the nature of the admission, the date it was made, and the medium by which it was made (*i.e.*, oral, email, writing).

10. State all facts upon which You base the contention that John holds 600 shares of Compass, including, but not limited to, the date John received the shares, the date on the stock certificates that reflect the shares, and list in Your Answers to Interrogatories all Documents which refer, relate, or pertain to the same.

11. Identify all individuals with shares or ownership interest in Compass, including the name and contact information of the shareholder(s), the number of shares held by each shareholder, the date acquired, the price paid, if any, and the means of acquisition.

12. Describe all facts supporting John's assertion that he alone can bring a claim on behalf of Compass without approval of Compass's Board of Directors and/or Compass's shareholders.

Respectfully submitted,

STEIN SPERLING BENNETT
DE JONG DRISCOLL PC

By: /s/ Jeffrey M. Schwaber
Jeffrey M. Schwaber (AIS # 8812160244)
jschwaber@steinsperling.com

By: /s/ Judith G. Cornwell
Judith G. Cornwell (AIS # 1112130195)
jcornwell@steinsperling.com

1101 Wootton Parkway, Suite 700
Rockville, Maryland 20852
301-340-2020
Fax: 301-354-8110

*Attorneys for Defendants Michael White,
George White, and Debra White*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 17th day of June, 2025, a copy of the foregoing was served via MDEC on all counsel of record.

/s/ Jeffrey M. Schwaber
Jeffrey M. Schwaber

STEIN SPERLING BENNETT
DE JONG DRISCOLL PC

ATTORNEYS AT LAW
1101 WOOTTON PARKWAY SUITE 700
ROCKVILLE, MARYLAND 20852

TELEPHONE 301-340-2020

REQUEST NO. 3. Compass's as-filed state and federal tax returns from June 1, 2001 to present.

REQUEST NO. 4. All Documents relating to any loan made by John to Compass.

REQUEST NO. 5. All Documents relating to any loan made by Michael to Compass.

REQUEST NO. 6. All stock certificates issued by Compass.

REQUEST NO. 7. All Documents relating to John's stock in Compass.

REQUEST NO. 8. All Documents which reflect the percentage of shares owned by each historic and current Compass shareholder.

REQUEST NO. 9. Any and all stock ledgers, records, or journals maintained by Compass from 2001 to present.

REQUEST NO. 10. All Documents evidencing or purporting to evidence any transfer, issuance, or assignment of Compass stock.

REQUEST NO. 11. All notices for any meeting of Compass's Board of Directors from 2010 to present.

REQUEST NO. 12. All formal or informal meeting minutes of Compass's Board of Directors from June 1, 2001 to present.

REQUEST NO. 13. All Documents that are or reflect any formal or informal action or resolution of Compass's Board of Directors from June 1, 2001 to present.

REQUEST NO. 14. All notices for any meeting of Compass's stockholders from 2010 to present.

REQUEST NO. 15. All formal or informal meeting minutes of Compass's stockholder meetings from June 1, 2001 to present.

STEIN SPERLING BENNETT
DE JONG DRISCOLL PC

ATTORNEYS AT LAW
1101 WOOTTON PARKWAY SUITE 700
ROCKVILLE, MARYLAND 20852

TELEPHONE 301-340-2020

REQUEST NO. 16. All Documents that are or reflect any formal or informal action or resolution of Compass's stockholders from June 1, 2001 to present.

REQUEST NO. 17. Compass's Articles of Incorporation.

REQUEST NO. 18. Compass's Bylaws.

REQUEST NO. 19. All Documents and Communications relating to the purported removal of Michael White and Daniel White from Compass's Board of Directors.

REQUEST NO. 20. All Documents and Communications relating to Compass's purported termination of Michael's employment.

REQUEST NO. 21. All Documents and Communications relating to Compass's purported termination of George's employment.

REQUEST NO. 22. All Documents and Communications relating to Compass's alleged discovery of the underlying acts alleged to comprise the Various Schemes.

REQUEST NO. 23. All Documents and Communications relating to the Secret Bank Account Scheme.

REQUEST NO. 24. All Documents and Communications relating to the Ghost Employee Scheme.

REQUEST NO. 25. All Documents and Communications relating to the IRS Tax Check Scheme.

REQUEST NO. 26. All Documents and Communications relating to the Shareholder Loan Scheme.

REQUEST NO. 27. All Documents and Communications relating to the Information Technology Lockout of Compass Business Records and Accounts Scheme.

REQUEST NO. 28. All Documents and Communications relating to the Sham Legal Claims Scheme.

REQUEST NO. 29. All Documents and Communications relating to the Anonymous Mailings Scheme.

REQUEST NO. 30. All Documents and Communications relating to the Corporate Credit Card Scheme.

REQUEST NO. 31. All Documents and Communications relating to the Flywheel Severance Scheme.

REQUEST NO. 32. All Documents and Communications relating to the Boshea Severance Scheme.

REQUEST NO. 33. All Documents and Communications relating to the Sham Ownership Interest Scheme.

REQUEST NO. 34. All Documents and Communications relating to the scheme to collaborate with Flywheel and its founders to misappropriate Compass's trade secrets and compete unfairly against Compass.

REQUEST NO. 35. All Documents relating to any business opportunity Compass purports it lost business as a result of one or more of the Various Schemes.

REQUEST NO. 36. All Documents relating to any investment Compass purports it lost as a result of one or more of the Various Schemes.

REQUEST NO. 37. All Documents relating to any client Compass purports it lost as a result of one or more of the Various Schemes.

REQUEST NO. 38. All Documents and Communications relating to any damages Compass claims in the above-caption lawsuit, which it attributes to alleged conduct of Michael.